

UNITED STATES DISTRICT COURT

for the

Eastern District of Missouri

____ Division

Syreeta LaShawn McNeal, Esq.

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Vera L. Calvin, Anthony T. Lofties, Joann A. Jenkins,
Terence B. Smith, Donovan R. Frison, Melissa S.
Scott-Chase, Natavia T. Garner, Felicia B. Moore,
Google LLC, YouTube LLC, and TikTok, Inc.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Syreeta LaShawn McNeal, Esq.

Street Address 3610 Buttonwood Drive, Suite 200

City and County Columbia, Boone County

State and Zip Code Missouri, 65201

Telephone Number (573) 886-8981

E-mail Address mcneallawoffice@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

| | |
|----------------------------------|-----------------------------------------------------------------|
| Name | Vera Lynn Calvin aka Pretty Brown Eyez (PBE) |
| Job or Title <i>(if known)</i> | YouTube, TikTok Content Creator and other social media accounts |
| Street Address | 7442 Universal Blvd, Unit 3207 |
| City and County | Orlando, Orange County |
| State and Zip Code | Florida, 32819 |
| Telephone Number | (904) 537-3882 |
| E-mail Address <i>(if known)</i> | theoriginalprettybrowneyes@gmail.com |

Defendant No. 2

| | |
|----------------------------------|-------------------------------------------------------------|
| Name | Anthony Terral Lofties |
| Job or Title <i>(if known)</i> | YouTube Content Creator and other social media accounts |
| Street Address | Eastside Heights Apartments, 120 South 5th Street, Apt. 406 |
| City and County | Nashville, Davidson County |
| State and Zip Code | Tennessee, 37206 |
| Telephone Number | (731) 433-8410 |
| E-mail Address <i>(if known)</i> | anthonyt_lofties@yahoo.com |

Defendant No. 3

| | |
|----------------------------------|---------------------------------------------------------|
| Name | Joann A. Jenkins aka Prosperity ThickGirl40 |
| Job or Title <i>(if known)</i> | YouTube Content Creator and other social media accounts |
| Street Address | 4468 Ponds St NE |
| City and County | Washington, District of Columbia |
| State and Zip Code | District of Columbia, 20019 |
| Telephone Number | (202) 397-6738 |
| E-mail Address <i>(if known)</i> | joannjenkins10@gmail.com |

Defendant No. 4

| | |
|----------------------------------|---------------------------------------------------------|
| Name | Terence B. Smith aka Giving you tha REAL T |
| Job or Title <i>(if known)</i> | YouTube Content Creator and other social media accounts |
| Street Address | 51 Peters Avenue |
| City and County | Hempstead, Nassau County |
| State and Zip Code | New York, 11550 |
| Telephone Number | (516) 857-2740 |
| E-mail Address <i>(if known)</i> | lila.gray2827@gmail.com |

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

Defendant No. ● 5

| | |
|----------------------------------|----------------------------------------------------------------|
| Name | <u>Donovan Rae Shawn Frison aka Chef Don Don</u> |
| Job or Title <i>(if known)</i> | <u>YouTube Content Creator and other social media accounts</u> |
| Street Address | <u>1200 Santa Rosa Avenue, Apt. 309</u> |
| City and County | <u>Odessa, Ector County</u> |
| State and Zip Code | <u>Texas, 79763</u> |
| Telephone Number | <u>(432) 349-5375</u> |
| E-mail Address <i>(if known)</i> | <u>dfrison2016@gmail.com</u> |

Defendant No. ● 6

| | |
|----------------------------------|----------------------------------------------------------------|
| Name | <u>Melissa Shely Scott-Chase aka Tea Talk With Ya Gyr</u> |
| Job or Title <i>(if known)</i> | <u>YouTube Content Creator and other social media accounts</u> |
| Street Address | <u>810 Franklin Avenue</u> |
| City and County | <u>Westminster, Carroll County</u> |
| State and Zip Code | <u>Maryland, 21157</u> |
| Telephone Number | <u>(240) 793-3557</u> |
| E-mail Address <i>(if known)</i> | <u></u> |

Defendant No. ● 7

| | |
|----------------------------------|----------------------------------------------------------------|
| Name | <u>Natavia Tonia Garner aka When Tay Talk</u> |
| Job or Title <i>(if known)</i> | <u>YouTube Content Creator and other social media accounts</u> |
| Street Address | <u>16717 Asbury Park</u> |
| City and County | <u>Detroit, Wayne County</u> |
| State and Zip Code | <u>Michigan, 48235</u> |
| Telephone Number | <u>(313) 297-2051</u> |
| E-mail Address <i>(if known)</i> | <u>whentaytalk@gmail.com</u> |

Defendant No. ● 8

| | |
|----------------------------------|----------------------------------------------------------------|
| Name | <u>Felicia Brim Moore aka Drop Da Mic</u> |
| Job or Title <i>(if known)</i> | <u>YouTube Content Creator and other social media accounts</u> |
| Street Address | <u>3103 Spring Drive</u> |
| City and County | <u>Alexandria, Fairfax County</u> |
| State and Zip Code | <u>Virginia, 22306</u> |
| Telephone Number | <u>(703) 619-0424</u> |
| E-mail Address <i>(if known)</i> | <u>dropdamic01@gmail.com</u> |

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

Defendant No. ● 9

Name Google LLC, a Delaware Limited Liability Company
Job or Title *(if known)* 1505 Corporation CSC - Lawyers Inc. Service, Registered Agent
Street Address 1600 Amphitheatre Parkway
City and County Mountain View, Santa Clara County
State and Zip Code California, 94043
Telephone Number (650) 253-0000
E-mail Address *(if known)* _____

Defendant No. ● 10

Name YouTube, LLC, a Delaware Limited Liability Company
Job or Title *(if known)* 1505 Corporation CSC - Lawyers Inc. Service, Registered Agent
Street Address 901 Cherry Avenue
City and County San Bruno, San Mateo County
State and Zip Code California, 94066
Telephone Number (650) 253-0000
E-mail Address *(if known)* _____

Defendant No. ● 11

Name TikTok, Inc., a California Corporation
Job or Title *(if known)* _____
Street Address 5800 Bristol Parkway, Suite 100
City and County Culver City, Los Angeles County
State and Zip Code California, 90230
Telephone Number _____
E-mail Address *(if known)* _____

Defendant No. ● 12

Name _____
Job or Title *(if known)* _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address *(if known)* _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

(1) Violation of Free Speech, Freedom of Assembly, and Free Exercise of Religion under First Amendment of the U. S. Constitution; (2) Violates Federal Trade Commission Act constituting an unfair or deceptive or practice in commerce (See 15 U.S.C. 45) with social media partnerships; (3) Violates five (5) rights of consumers under Consumer Protection Act of 1986 (See 15 U.S.C. 41-58)

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Syreeta LaShawn McNeal, Esq., is a citizen of the State of *(name)* Missouri

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)* and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Vera Lynn Calvin, is a citizen of the State of *(name)* Florida. Or is a citizen of *(foreign nation)*

b. If the defendant is a corporation

The defendant, *(name)* Google, LLC, is incorporated under the laws of the State of *(name)* Delaware, and has its principal place of business in the State of *(name)* California. Or is incorporated under the laws of *(foreign nation)*, and has its principal place of business in *(name)* California.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Plaintiff Request damages totaling \$10 million dollars consisting of attorney fees, health and medical costs, court costs, damage to business reputation and access to business clients, personal security for health, safety and welfare concerns, punitive damages, etc...

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

YouTube Content Creator Anthony Lofties used my subscriber information and contact people from St. Louis, MO to dox me initially. He conspired with YouTube Content Creator When Tay Talk (Natavia Tonia Garner) and Drop Da Mic (Felicia Brim Moore) to publish my full government name through other panelists on their Gossip Girl YouTube Live. Also, he conspired with YouTube Content Creator Propserity ThickGirl40 (Joann A. Jenkins) to run two (2) to three (3) YouTube Lives to publish an article, Linked-in profile, my picture, and other information even-though I was never a subscriber or panelist to her channel. Also, YouTube Content Creator Pretty Brown Eyez (PBE) (Vera Lynn Calvin) published an illegally recorded police officer statement and audio from a disciplinary hearing as well.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Mr. Anthony Lofties doxed me in July 2023 per intelligence. Ms. Natavia Garner (When Tay Talk) and Ms. Felicia Moore (Drop Da Mic) allowed panelist to dox me (i.e. publish my full government name & info on Plaintiff) during a YouTube Live on 7/25/23 & 12/7/23. Ms. Joann A. Jenkins (Prosperity ThickGirl40) and Donovan Frisbon (Chef Don Don) continued to dox Plaintiff on the evening of 7/28/23, 8/2/23, 12/7/23 & 12/20/23. Ms. Vera L. Calvin continued to dox, harass and threaten Plaintiff's life on 11/5/23, 11/6/23, 11/13/23, 11/21/23, 12/9/23, 12/10/23, 12/20/23 & 12/22/23. Mr. Terence B. Smith (Giving You Tha REAL T) doxed, harassed and threatened Plaintiff's life on 12/6/23. Mrs. Melissa Shely Scott-Chase (Tea Talk With Ya Gyr) harassed & threatened me on 12/6/23 & 12/8/23.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Plaintiff is a federal attorney licensed in the U.S. District Court of the Eastern & Western District of Missouri and the State of Missouri. Plaintiff visited YouTube Content Creators' channels to discuss current events and analyze a television show, Love and Marriage Huntsville (LAMH) on the Own Network/Discovery/Warner Brothers. Plaintiff only provided her first initial and last name and asked for YouTube Content Creators to refer to her as "Anonymous" to keep anonymity and protect her official identity. Plaintiff would give public information regarding narcissism and public legal tools with Family Law Courts to help the public understand and spot behavioral traits of people exhibiting mental illness so they could learn how to set boundaries & have healthy productive relationships. Defendant YouTube Content Creators conspired to make an effort to invade my right to privacy (public disclosure of private facts), dox, harass, threaten me, human stalk a federal attorney, & attack law practice from July 2023 to present in order to silence my right to free speech, freedom of assembly & other constitutional rights.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Plaintiff sent various cease and desist letters by email and certified mail to Defendant Joann A. Jenkins (Prosperity ThickGirl40) on 8/1/2023 and 8/2/2023 and Defendant Vera Lynn Calvin (Pretty Brown Eyez (PBE)) on 10/25/2023 to no avail. Also, Plaintiff filed and received an Ex Parte Order of Protection - Adult to have Defendant Vera Lynn Calvin (Pretty Brown Eyez (PBE)) stop doxing, harassing and threatening the Plaintiff in Syreeta L. McNeal, Esq. v. Vera L. Calvin; Case No. 23BA-FC01941 on 11/7/2023. Defendants continue to ignore any valid court order & commit federal crimes such as dox, cyberstare, cyberharass, threaten, & human stalk a federal attorney without consequences. Plaintiff believes the Defendant YouTube Content Creators are conspiring to dox, harass and threaten a federal attorney led by Anthony Lofties and When Tay Talk (Natavia Tonia Garner). Also, they threaten to put a petition of LAMH YouTube Content Creators to file a bar complaint against me. Plaintiff needs a preliminary and permanent injunction to have their Google LLC dba YouTube LLC, TikTok, Inc. and other social media account to be suspended indefinitely for violation of Plaintiff's civil rights.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

(1) Preliminary and/or Permanent Injunction to disable all social media accounts for Defendants YouTube Content Creators on Google LLC dba YouTube LLC, TikTok, Inc., and any other social media platform.

(2) Order Local Police or Federal Bureau of Investigation (FBI) to Issue Law Enforcement Request System (LERS) to disable or shut down all social media accounts for Defendant YouTube Content Creators

Damages of \$10 million consist of the following: (a) Damage to law practice, clients & business reputation (11 * \$100K to \$150K for annual profits that can be impacted by Defendants doxing, harassment & threats, range of \$1.1M to \$1.65M); (b) Emergency Hospital Costs related to high blood pressure, heart attack symptoms & stress associated with Defendants attacks currently ranging from \$5k to \$10k; (c) increased therapy costs due to Defendants attacks ranging from \$2.5K to \$5k; (d) Court Costs ranging from \$2K to \$3k; (e) Attorney Fees for (\$5K plus 33% to 50% of reward); (f) punitive damages (5x's to 6x's actual rewards) for Defendants attacks.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/29/2023

Signature of Plaintiff

Printed Name of Plaintiff


Syreeta LaShawn McNeal, Esq.

B. For Attorneys

Date of signing: 12/29/2023

Signature of Attorney

Printed Name of Attorney

Bar Number

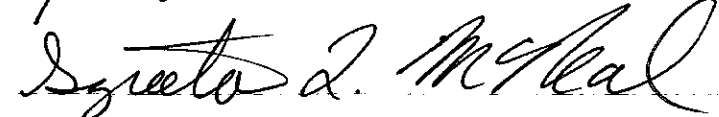
Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address


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MoBar 60207
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Missouri 65201
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mcneallawoffice@gmail.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

Syreeta LaShawn McNeal, Esq.,)

) Case no. _____

v.)

Vera Lynn Calvin et al,)

December 29, 2023

MEMORANDUM FOR CLERK

Additional Individual Defendant(s):

- (1) The Defendant, Anthony Terral Lofties, is a citizen of the State of Tennessee.
- (2) The Defendant, Joann A. Jenkins, is a citizen of the District of Columbia.
- (3) The Defendant, Terence B. Smith, is a citizen of the State of New York.
- (4) The Defendant, Donovan Rae Shawn Frison, is a citizen of the State of Texas.
- (5) The Defendant, Melissa Shelly Scott-Chase, is a citizen of the State of Maryland.
- (6) The Defendant, Natavia Tonia Garner, is a citizen of the State of Michigan.
- (7) The Defendant, Felicia Brim Moore, is a citizen of the State of Virginia.

Additional Corporate Defendant(s):

- (8) YouTube, LLC, is incorporated under the laws of the State of Delaware, and has its principal place of business in the State of California, and has its principal place of business in the State of California.
- (9) TikTok, Inc. is incorporated under the laws of China and is incorporated under the laws of the State of California, and has its principal place of business in the State of California.

/s/ Syreeta L. McNeal, MoBar 60207

Please circle which applies: Pro se (Attorney for) Plaintiff

(Pro se) (Attorney for) Defendant